

### ATSDR EI Report - EMBARGOED

Douglas Jae P to: 'Dale Mitchel'

12/05/2011 12:21 PM

Elizabeth Allen, "bermanf@ohsu.edu", "KNOTTS Bradley A", "Bruce Cc: Pokarney", "BAYHAM Chris", "Christine L STONE", "Dale Mitchell", "David G FARRER", Scott Downey, Sheila Fleming, "Gail R

[attachment "ATSDR Hwy 36 EI report\_interancy review.docx" deleted by Scott Downey/R10/USEPA/US]

Hi All,

Attached you will find an embargoed draft of the Exposure Investigation report, prepared by ATSDR in cooperation with OHA. As with previous items, we have a quick turnaround on this. Please review and provide comments by COB on Thursday, 12/8.

Jae

Re: ATSDR El Report - EMBARGOED

Elizabeth Allen to: Douglas Jae P

12/06/2011 09:13 AM

Alan Henning, "bermanf@ohsu.edu", "KNOTTS Bradley A", "Bruce Pokarney", Cc: "Christine L STONE", "BAYHAM Chris", "Dale Mitchell", "David G FARRER", "Dale Mitchel", "Gail R SHIBLEY", "SMITH Grant S (Link)", "PETTIT Greg", "Jeff

Hi Jae,

attached are minor edits/suggestions from both Sheila and myself. I have one additional suggestion for the text regarding the 2,4-D BE. That is to provide the definition of a reference dose, which is as an estimate (with uncertainty spanning perhaps an order of magnitude) of a daily exposure to humans (including sensitive subgroups) that is likely to be without an appreciable risk of adverse health effects over a lifetime. The report could then point out, as it does now, that the maximum reported detection is approximately an order of magnitude less than the calculated BE, and stop there. Let someone else do the arithmetic and draw their own conclusions. I think that stating a conclusion about potential health outcomes with regard to specific individuals, however valid it may seem based on those two pieces of information, is premature at this point in the investigation.

One other thing to check in the discussions of the analytical methods, the text notes that analytes were quantified using mass spectrometry. I'm loathe to admit how may years (or decades) have passed between me and my analytical chemistry classes at Berkeley, but my understanding is that the MS confirms the identity of the analyte, while the chromatogram represents the quantitative aspect. A brief discussion with one of our illustrious chemists did not result in my having a different understanding of the process.

E

[attachment "ATSDR Hwy 36 El report interancy review SF.docx" deleted by Scott Downey/R10/USEPA/US]

Elizabeth Allen Office of Environmental Assessment, Risk Evaluation Unit US Environmental Protection Agency, Region 10 1200 Sixth Ave, Suite 900 Seattle, WA 98101

206-553-1807 allen.elizabeth@epa.gov



## Biomonitoring Interpretation from the 2,4-D Task Force

'Terry Witt', 'Paulette Pyle', katy.coba,

James Gray to: peter.daugherty, dale.l.mitchell, lisa.r.hanson,

jea.p.douglas, melvin.a.kohn, 'Jenkins, Jeffrey',

12/06/2011 10:54 AM

Cc: Ihammond, Bill.Mahlburg, jkunstman, "'Jim Armbruster", dfonseca

Please respond to james .gray

History:

This message has been forwarded.

[attachment "Urine Biomonitoring 2-page pdf.pdf" deleted by Scott Downey/R10/USEPA/US] [attachment "Aylward etal Biomonitoring BE public health EHP2010.pdf" deleted by Scott Downey/R10/USEPA/US] Colleagues,

In anticipation of the release of biomonitoring results to the residents of Triangle Lake area in Oregon; the 2,4-D Task Force thought it would be supportive to provide information to help put analytical results into context. We are pleased to provide a short explanatory document on biomonitoring. Feel free to share this. This information is extracted from peer-reviewed papers published on the subject within the past few years, including the CDC 2005 Third National Report on Human Exposure to Environmental Chemicals, in which the NHANES is discussed. We also attach the Aylward etal Biomonitoring paper which is the definitive discussion of 2,4-D Biomonitoring Equivalents.

2,4-D herbicide is a valuable crop production and invasive species management tool. It has undergone significant data development world-wide and has undergone decades of extraordinary scrutiny by regulatory authorities mandated with protecting human health and the environment. All have reached the same conclusion that 2,4-D is acceptable for use according to label directions. Published Biomonitoring Equivalents work is consistent with the EPA assessment of a reasonable certainty of no harm from use.

The Task Force remains available to help as requested. For backgrounders, published papers and government decisions, please visit www.24D.org

Regards,

## Jim

Jim Gray Executive Director Industry Task Force II on 2,4-D Research Data james.gray@24d.org 1800-345-5109 www.24d.org



RE: Biomonitoring Interpretation from the 2,4-D Task Force

james.gray, Terry Witt, Paulette Pyle,

Bus, Jim (JS) to: katy.coba, peter.daugherty, dale.l.mitchell,

lisa.r.hanson, jea.p.douglas, melvin.a.kohn,

12/06/2011 12:36 PM

Cc: Ihammond, Bill.Mahlburg, jkunstman, "Jim Armbruster", "Fonseca,

Diego (D)"

History:

This message has been forwarded.

[attachment "Urine Biomonitoring 2-page pdf.pdf" deleted by Scott Downey/R10/USEPA/US] Jim,

The 2-pager looks good to me. The third bullet is missing ...extended "one-generation".

Hopefully the readers of the 2-pager will notice that authors of the BE study includes Dana Barr, the lead investigator conducting the OR biomonitoring study.

From: James Gray [mailto:James.Gray@24d.org] Sent: Tuesday, December 06, 2011 1:54 PM

To: 'Terry Witt'; 'Paulette Pyle'; katy.coba@state.or.us; peter.daugherty@state.or.us; dale.l.mitchell@state.or.us; lisa.r.hanson@state.or.us; jea.p.douglas@state.or.us; melvin.a.kohn@state.or.us; 'Jenkins, Jeffrey'; sudakind@ace.orst.edu; bpokarney@oda.state.or.us; gail.r.shibley@state.or.us; Downey.Scott@epamail.epa.gov; Kauffman.Richard@epa.gov Cc: lhammond@indy.rr.com; Bill.Mahlburg@us.nufarm.com; jkunstman@pbigordon.com; 'Jim Armbructer'; Foncesa Diogo (D)

Armbruster'; Fonseca, Diego (D)

Subject: Biomonitoring Interpretation from the 2,4-D Task Force

Importance: High

#### Colleagues.

In anticipation of the release of biomonitoring results to the residents of Triangle Lake area in Oregon; the 2,4-D Task Force thought it would be supportive to provide information to help put analytical results into context. We are pleased to provide a short explanatory document on biomonitoring. Feel free to share this. This information is extracted from peer-reviewed papers published on the subject within the past few years, including the CDC 2005 Third National Report on Human Exposure to Environmental Chemicals, in which the NHANES is discussed. We also attach the Aylward etal Biomonitoring paper which is the definitive discussion of 2,4-D Biomonitoring Equivalents.

2,4-D herbicide is a valuable crop production and invasive species management tool. It has undergone significant data development world-wide and has undergone decades of extraordinary scrutiny by regulatory authorities mandated with protecting human health and the environment. All have reached the same conclusion that 2,4-D is acceptable for use according to label directions. Published Biomonitoring Equivalents work is consistent with the EPA assessment of a reasonable certainty of no harm from use.

The Task Force remains available to help as requested. For backgrounders, published papers and government decisions, please visit www.24D.org

Regards,

# Jim

Jim Gray
Executive Director
Industry Task Force II on 2,4-D Research Data
james.gray@24d.org
1800-345-5109
www.24d.org